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**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

**TERESA CAPONIO,**

**Plaintiff,**

**vs.**

**BOILERMAKERS LODGE 549;  
BOILERMAKERS WESTERN STATES  
JOINT APPRENTICESHIP PROGRAM;  
and INTERNATIONAL  
BROTHERHOOD OF  
BOILERMAKERS,**

**Defendants.**

**Case Number: 16-cv-3919-VC**

**JOINT STIPULATION AND  
[PROPOSED] ORDER CONTINUING  
DEADLINES FOR MOTION TO  
DISMISS BRIEFING**

Complaint Filed: July 12, 2016  
Amended Complaint Filed: October 5, 2016

~~JOINT STIPULATION AND [PROPOSED] ORDER CONTINUING CASE MANAGEMENT  
CONFERENCE AND BRIEFING DEADLINES~~  
Case No. 16-cv-3919

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28 *JOINT STIPULATION AND ~~[PROPOSED]~~ ORDER CONTINUING CASE MANAGEMENT*  
*CONFERENCE AND BRIEFING DEADLINES*  
Case No. 16-cv-3919

Pursuant to United States District Court, Northern District of California Local Rule 6-2, the following Stipulation is entered into by Plaintiff TERESA CAPONIO ("Plaintiff") and Defendants BOILERMAKERS LODGE 549, BOILERMAKERS WESTERN STATES JOINT APPRENTICESHIP PROGRAM and INTERNATIONAL BROTHERHOOD OF BOILERMAKERS ("Defendants") (collectively, the "Parties") by and through their counsel of record:

WHEREAS, Defendants have filed Motions to Dismiss with prejudice;

WHEREAS, the Motions to Dismiss were noticed to be heard on November 10, 2016;

WHEREAS, the Court set the Case Management Conference on November 22, 2016;

WHEREAS, on October 5, 2016, Plaintiff filed her Amended Complaint;

WHEREAS, based upon professional courtesy, and suffering no prejudice, Plaintiff and Defendants have agreed to the following deadlines for briefing for to-be-filed renewed motions to dismiss to the Amended Complaint: Defendants' Renewed Motions to Dismiss to be filed by November 8, 2016; Plaintiff's Opposition by December 6, 2016; Defendants' Reply in Support by December 20, 2016; and

WHEREAS Defendants are canceling the hearing on the currently pending Motions to Dismiss, scheduled for November 10, 2016 and will notice the Renewed Motions to Dismiss to be heard on January 26, 2017;

IT IS HEREBY STIPULATED AS FOLLOWS:

The Parties respectfully request the Court cancel the November 10, 2016 hearing date on the currently pending Motions to Dismiss, ~~and continue the Case Management Conference currently set for November 22, 2016 to January 26, 2017, to coincide with the anticipated motion hearing; or if that date is improper for a case management conference, on the earliest available date thereafter, January 31, 2017.~~

The Parties further respectfully request that the Court permit the following deadlines for briefing for to-be-filed renewed motions to dismiss to the Amended Complaint: Defendants'

*JOINT STIPULATION AND [PROPOSED] ORDER CONTINUING CASE MANAGEMENT CONFERENCE AND BRIEFING DEADLINES*

Case No. 16-cv-3919

Renewed Motions to Dismiss to be filed by November 8, 2016; Plaintiff's Opposition by December 6, 2016; Defendants' Reply in Support by December 20, 2016.

Dated: October \_\_\_\_, 2016

Respectfully Submitted,

/s/ Jason R. McClitis

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~~JOINT STIPULATION AND [PROPOSED] ORDER CONTINUING CASE MANAGEMENT  
CONFERENCE AND BRIEFING DEADLINES~~

Case No. 16-cv-3919

~~[PROPOSED]~~ ORDER

PURSUANT TO THE STIPULATION OF THE PARTIES, IT IS SO ORDERED.

Dated: October 19, 2016



HON. VINCE CHHABRIA  
UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

*JOINT STIPULATION AND ~~[PROPOSED]~~ ORDER CONTINUING CASE MANAGEMENT  
CONFERENCE AND BRIEFING DEADLINES*  
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